

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Consolidated Civil Action**

RALEIGH WAKE CITIZENS  
ASSOCIATION, et al.

Plaintiffs,

v.

WAKE COUNTY BOARD  
OF ELECTIONS,

Defendant.

No. 5:15-cv-156

CALLA WRIGHT, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA,  
et al.,

Defendants.

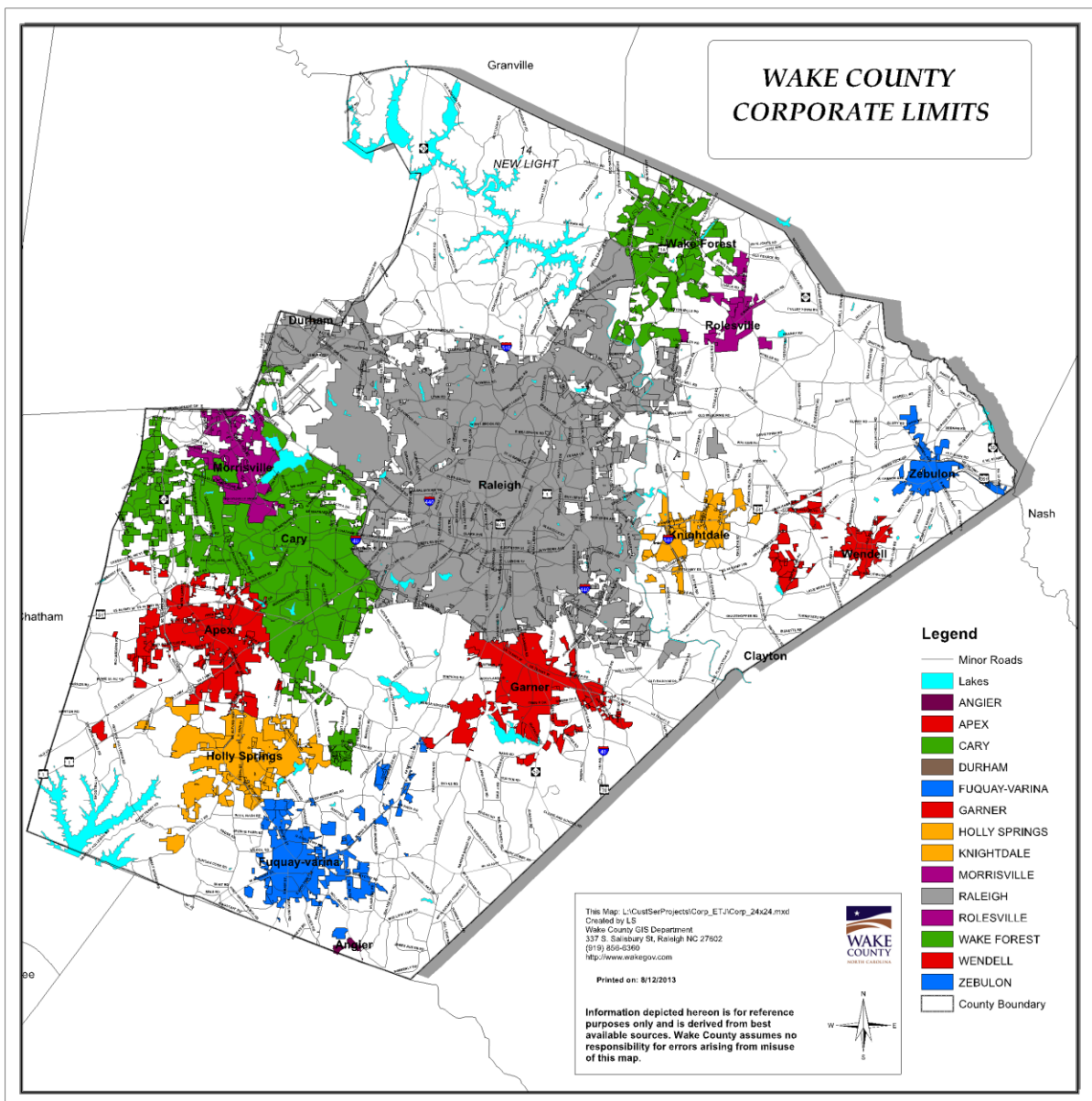
No. 5:13-cv-607

**AMENDED FIRST JOINT STIPULATIONS OF FACT**

The parties jointly stipulate to the following facts:

*Wake County population data*

1. Wake County includes the City of Raleigh and thirteen other municipalities,  
geographically distributed as follows:



Wake County Corporate Limits, Wake County GIS,

[http://www.wakegov.com/gis/services/Documents/Corp\\_24x24.pdf](http://www.wakegov.com/gis/services/Documents/Corp_24x24.pdf) (last visited Dec. 8, 2015).

2. In 2000, the population of Wake County was 627,846. Wake County, North Carolina, U.S. Census Bureau FactFinder,

[http://factfinder.census.gov/bkmk/table/1.0/en/DEC/00\\_SF1/DP1/0500000US37183](http://factfinder.census.gov/bkmk/table/1.0/en/DEC/00_SF1/DP1/0500000US37183) (last visited Dec. 8, 2015).

3. In 2010, the population of Wake County was 900,993. Wake County, North Carolina, U.S. Census Bureau QuickFacts, <http://quickfacts.census.gov/qfd/states/37/37183.html> (last visited Dec. 8, 2015).

4. In 1999-2000 school year, the student population in the Wake County Public School System was 98,772. North Carolina Public Schools Statistical Profiles, North Carolina Department of Public Instruction (2001), at 298, <http://www.ncpublicschools.org/docs/fbs/resources/data/statisticalprofile/2001profile.pdf>.

5. In 2010, the student population in the Wake County Public School System was 143,289. Board Meeting Minutes, Wake County Board of Education, at 4 (Feb. 2, 2011), <http://webarchive.wcpss.net/about-us/our-leadership/board-of-education/minutes/02-01-2011--minutes.pdf>.

6. In 2012, the Wake County Board of Education considered recommended student assignment maps for the 2013-2014 school year. Work Session Materials, Wake County Board of Education (Nov. 13, 2012), <http://webarchive.wcpss.net/about-us/our-leadership/board-of-education/work-session-materials/11-13-2012--work-session/>.

Wake County Board of Education election data

7. Wake County Board of Education members elected from 1999 through 2013, and their political party registrations are as follows:

Year	Name	Political party registration
1999	Beverley Clark	Democrat
1999	Rosa Gill	Democrat
1999	Tom Oxholm	Unaffiliated
1999	Susan Parry	Democrat
1999	Wray Stephens	Unaffiliated
2001	Bill Fletcher	Republican
2001	Patti Head	Republican
2001	Kathryn Quigg	Democrat

2001	Amy White	Republican
2003	Beverley Clark	Democrat
2003	Rosa Gill	Democrat
2003	Ron Margiotta	Republican
2003	Carol Parker	Republican
2003	Susan Parry	Democrat
2005	Eleanor Goettee	Democrat
2005	Patti Head	Republican
2005	Lori Millberg	Democrat
2005	Horace Tart	Republican
2007	Beverley Clark	Democrat
2007	Rosa Gill	Democrat
2007	Kevin Hill	Unaffiliated
2007	Ron Margiotta	Republican
2007	Anne McLaurin	Democrat
2009	Debra Goldman	Republican
2009	Chris Malone	Republican
2009	Deborah Prickett	Republican
2009	John Tedesco	Republican
2011	Susan Evans	Democrat
2011	Kevin Hill	Unaffiliated
2011	Christine Kushner	Democrat
2011	Jim Martin	Democrat
2011	Keith Sutton	Democrat
2013	Tom Benton	Democrat
2013	Zora Felton	Democrat
2013	Bill Fletcher	Republican
2013	Monika Johnson-Hostler	Democrat

Past Election Results, Wake County Board of Elections,

<http://www.wakegov.com/elections/data/Pages/pastelectionresults.aspx> (last visited Dec. 8, 2015) (see Board of Education Elections on Oct. 9, 2001; Oct. 7, 2003; Oct. 11, 2005; Oct. 9, 2007; Oct. 6, 2009; Oct. 11, 2011; and Oct. 8, 2013; and Runoff Elections on Nov. 6, 2001; Nov. 8, 2005; Nov. 3, 2009; and Nov. 8, 2011); NC Voter Lookup, North Carolina State Board of Elections, [https://enr.ncsbe.gov/voter\\_search\\_public/](https://enr.ncsbe.gov/voter_search_public/) (last visited Dec. 11, 2015).

8. After the 2010 Census, the population deviations for the existing nine single-member districts of the Wake County Board of Education were as follows:

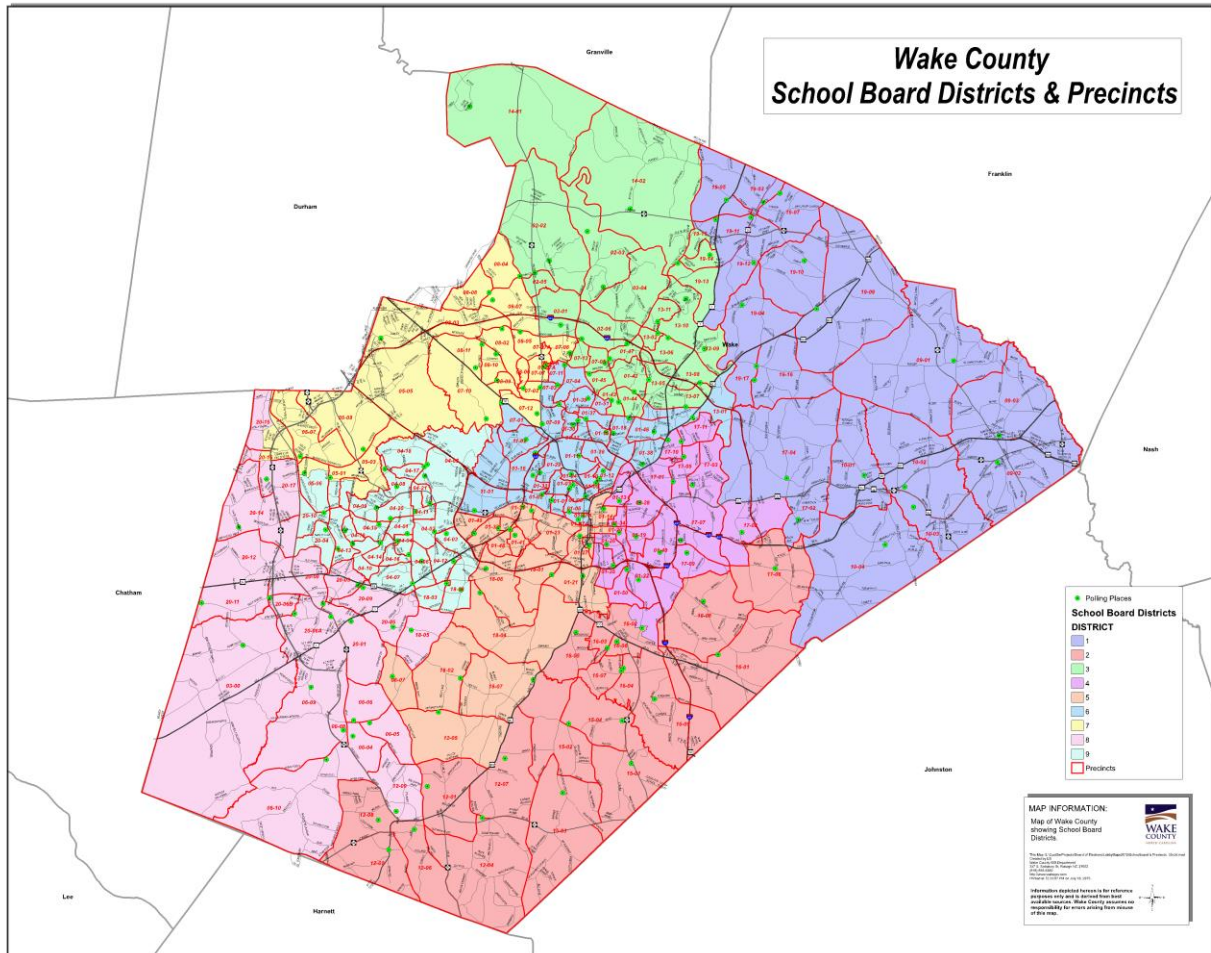
<b>District</b>	<b>Deviation</b>	<b>Percentage deviation</b>
1	11,774	11.76%
2	15,805	15.79%
3	5,926	5.92%
4	-3,157	-3.15%
5	-13,055	-13.04%
6	-28,200	-28.17%
7	19,739	19.72%
8	18,798	18.78%
9	-27,627	-27.6%
Overall		47.89%

Wake County Schools District Maps and Statistics, WRAL (Apr. 11, 2011), [http://www.wral.com/asset/news/education/wake\\_county\\_schools/2011/04/11/9423527/176699-20110411183243947.pdf](http://www.wral.com/asset/news/education/wake_county_schools/2011/04/11/9423527/176699-20110411183243947.pdf).

9. In 2011, the Wake County Board of Education hired the Shanahan Law Group to draft new district boundaries for the Board's nine single-member districts. Meeting Minutes, Wake County Board of Education, at 5 (Feb. 15, 2011), <http://webarchive.wcpss.net/about-us/our-leadership/board-of-education/minutes/02-15-2011--minutes.pdf>.

10. The Wake County Board of Education adopted the Shanahan Law Group's proposed boundaries in May 2011, effective for the 2011 elections. Meeting Agenda, Wake County Board of Education (May 17, 2011), [http://webarchive.wcpss.net/about-us/our-leadership/board-of-education/agendas\\_schedules/05\\_17\\_2011-agenda.html](http://webarchive.wcpss.net/about-us/our-leadership/board-of-education/agendas_schedules/05_17_2011-agenda.html).

11. The Shanahan Law Group's proposed boundaries for the Wake County Board of Education's nine single-member districts that were adopted by the Board are shown below:



Wake County School Board Districts & Precincts, Wake County GIS,

<http://www.wakegov.com/gis/services/Documents/SchoolBoardDistricts34x44.pdf> (last visited Dec. 8, 2015).

## Senate Bill 325

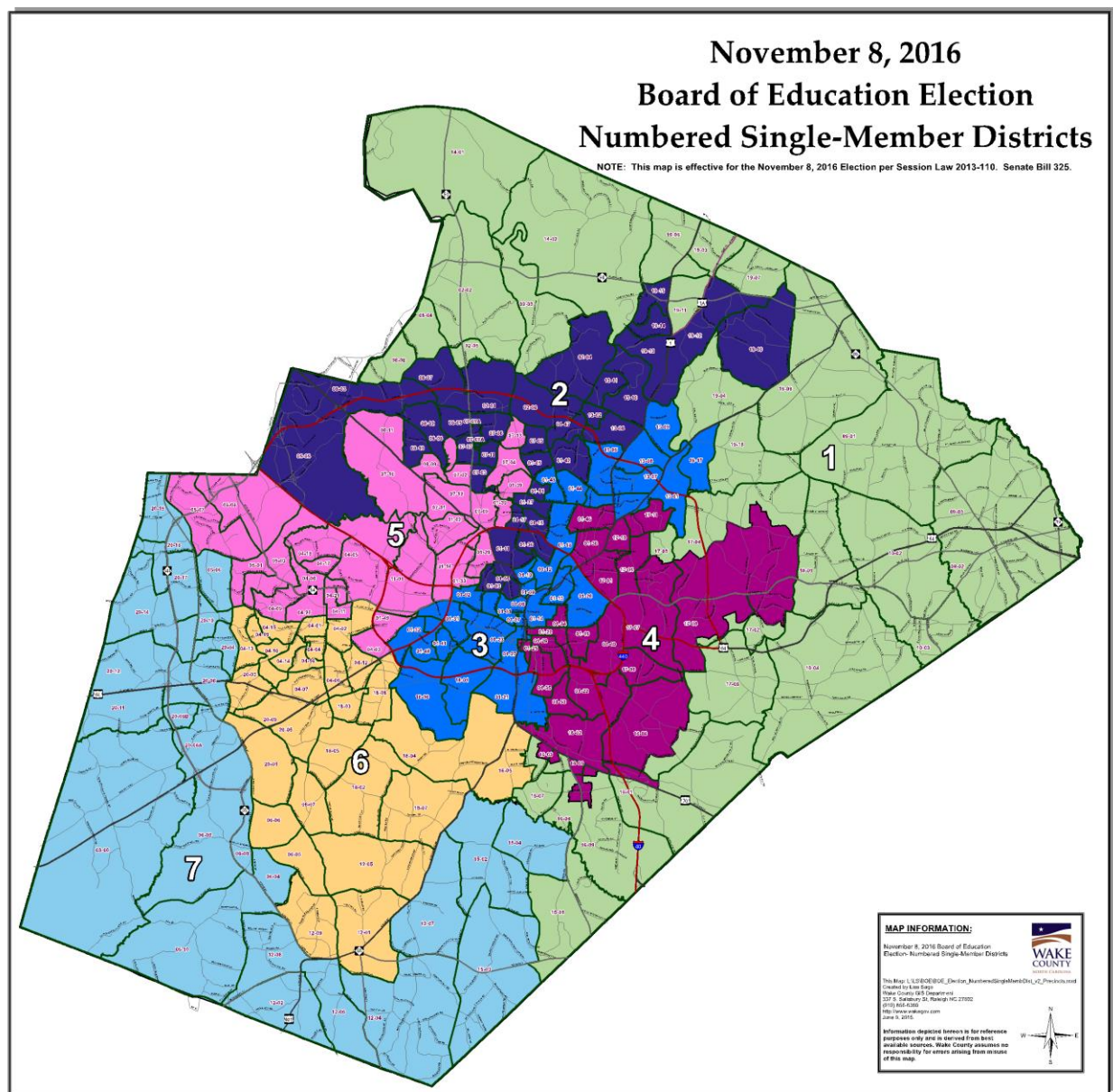
12. Senate Bill 325 was filed in the North Carolina General Assembly on March 13, 2013 by Senators Neal Hunt and Chad Barefoot of Wake County. Senate Bill 325 / S.L. 2013-110, North Carolina General Assembly,

<http://www.ncleg.net/gascripts/BillLookUp/BillLookUp.pl?Session=2013&BillID=s325> (last visited Dec. 8, 2015).



13. Senate Bill 325 restructures and redistricts the Wake County Board of Education using seven numbered single-member districts and two lettered single-member “super districts” that overlap the seven numbered districts. Senate Bill 315 / S.L. 2013-110, North Carolina General Assembly, <http://www.ncleg.net/Sessions/2013/Bills/Senate/PDF/S325v6.pdf> (last visited Dec. 8, 2015).

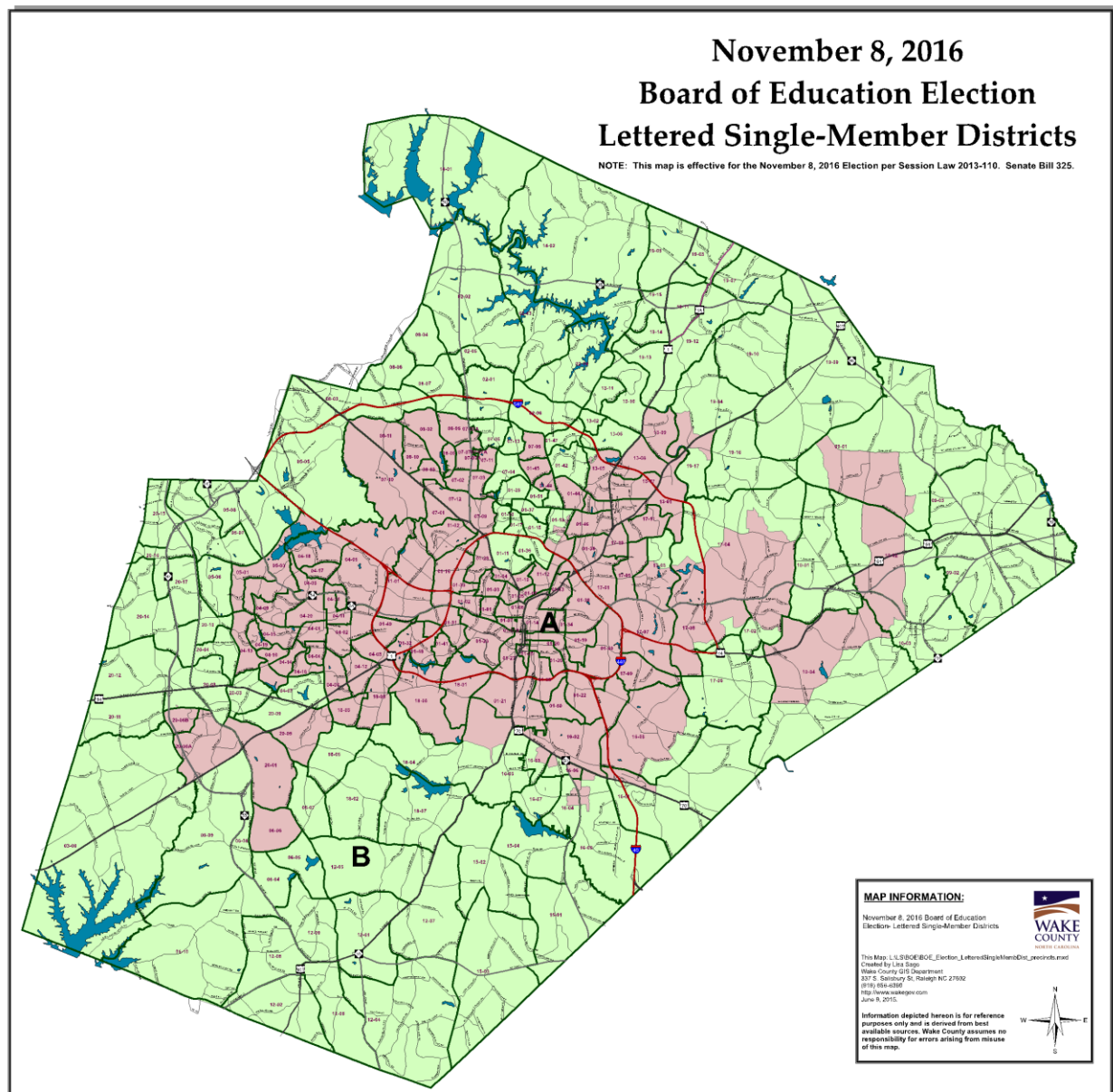
14. A map of the 7 numbered districts under Senate Bill 325 is as follows:



Board of Education Election Numbered Single-Member Districts, Wake County GIS,

[http://www.wakegov.com/gis/services/Documents/BOE\\_Election\\_NumbSingleMembDist.pdf](http://www.wakegov.com/gis/services/Documents/BOE_Election_NumbSingleMembDist.pdf)  
(last visited Dec. 8, 2015).

15. A map of the 2 super districts under Senate Bill 325 is as follows:



Board of Education Lettered Single-Member Districts, Wake County GIS,

[http://www.wakegov.com/gis/services/Documents/BOE\\_Election\\_LetteredSingleMembDist.pdf](http://www.wakegov.com/gis/services/Documents/BOE_Election_LetteredSingleMembDist.pdf)  
(last visited Dec. 8, 2015).



16. Under Senate Bill 325, no elections were held for the Wake County Board of Education in 2015. Senate Bill 325 / S.L. 2013-110, North Carolina General Assembly, <http://www.ncleg.net/Sessions/2013/Bills/Senate/PDF/S325v6.pdf> (last visited Dec. 8, 2015).

17. Population deviations in the numbered and lettered districts under Senate Bill 325 as introduced were as follows:

District	Deviation	Percentage deviation
1	3550	2.76%
2	-5398	-4.19%
3	4,678	3.63%
4	1,591	1.24%
5	239	0.19%
6	-174	-0.14%
7	-4,484	-3.48%
A	22,088	4.90%
B	-22,089	-4.90%

Senate Bill 325 / S.L. 2013-110, North Carolina General Assembly, <http://www.ncleg.net/Sessions/2013/Bills/Senate/PDF/S325v1.pdf> (last visited Dec. 8, 2015).

18. On April 17, 2013, the Senate Redistricting Committee heard public comment on Senate Bill 325 and voted to favorably report the bill to the full Senate for consideration. Senate Bill 325 / S.L. 2013-110, North Carolina General Assembly, <http://www.ncleg.net/gascripts/BillLookUp/BillLookUp.pl?Session=2013&BillID=s325> (last visited Dec. 8, 2015).

19. On April 22, 2013, the Senate debated and passed Senate Bill 325. *Id.*

20. Individual senators' votes on Senate Bill 325, broken down by political party registration, were as follows:

Senator	Vote	Party registration
Allran	Aye	Republican
Apodaca	Aye	Republican

Barefoot	Aye	Republican
Barringer	Aye	Republican
Berger	Aye	Republican
Bingham	Aye	Republican
Brock	Aye	Republican
Brown	Aye	Republican
Brunstetter	Aye	Republican
Cook	Aye	Republican
Curtis	Aye	Republican
Daniel	Aye	Republican
J. Davis	Aye	Republican
Goolsby	Aye	Republican
Gunn	Aye	Republican
Harrington	Aye	Republican
Hartsell	Aye	Republican
Hise	Aye	Republican
Hunt	Aye	Republican
Jackson	Aye	Republican
Meredith	Aye	Republican
Newton	Aye	Republican
Pate	Aye	Republican
Rabin	Aye	Republican
Rabon	Aye	Republican
Randleman	Aye	Republican
Rucho	Aye	Republican
Sanderson	Aye	Republican
Soucek	Aye	Republican
Tarte	Aye	Republican
Tillman	Aye	Republican
Tucker	Aye	Republican
Wade	Aye	Republican
Blue	No	Democrat
Bryant	No	Democrat
Clark	No	Democrat
Clodfelter	No	Democrat
D. Davis	No	Democrat
Ford	No	Democrat
Graham	No	Democrat
Jenkins	No	Democrat
Kinnaird	No	Democrat
McKissick	No	Democrat
McLaurin	No	Democrat
Nesbitt	No	Democrat
Parmon	No	Democrat
Robinson	No	Democrat

Stein	No	Democrat
Walters	No	Democrat
Woodard	No	Democrat

Roll Call for Senate Second Reading of Senate Bill 325 Second Reading, North Carolina General Assembly,

<http://www.ncleg.net/gascripts/voteHistory/RollCallVoteTranscript.pl?sSession=2013&sChamber=S&RCS=188> (last visited Dec. 11, 2015); NC Voter Lookup, North Carolina State Board of Elections, [http://www.ncsbe.gov/webapps/voter\\_search/](http://www.ncsbe.gov/webapps/voter_search/) (last visited Dec. 11, 2015).

21. On May 29, 2013, the House Elections Committee heard public comment on Senate Bill 325 and voted to favorably report a committee substitute bill to the full Senate for consideration. *Id.*

22. The House Elections Committee substitute bill to Senate Bill 325 did not change any of the district boundaries in the original bill. Proposed House Committee Substitute to Senate Bill 325, North Carolina General Assembly, [www.ncleg.net/Applications/BillLookUp/LoadBillDocument.aspx?SessionCode=2013&DocNum=5624&SeqNum=0](http://www.ncleg.net/Applications/BillLookUp/LoadBillDocument.aspx?SessionCode=2013&DocNum=5624&SeqNum=0) (last visited Dec. 8, 2015)

23. On June 10, 2013, the House debated and passed Senate Bill 325, with two amendments from Representative Paul Stam of Wake County. Senate Bill 325 / S.L. 2013-110, North Carolina General Assembly, <http://www.ncleg.net/gascripts/BillLookUp/BillLookUp.pl?Session=2013&BillID=s325> (last visited Dec. 8, 2015).

24. The two amendments to Senate Bill 325 from Representative Paul Stam adjusted the candidate filing period and slightly changed the district boundaries in the original bill. Amendment No. A1 to Senate Bill 325, North Carolina General Assembly,

<http://www.ncleg.net/Applications/BillLookUp/LoadBillDocument.aspx?SessionCode=2013&DocNum=5858&SeqNum=0>; Amendment No. A2 to Senate Bill 325, North Carolina General Assembly,

<http://www.ncleg.net/Applications/BillLookUp/LoadBillDocument.aspx?SessionCode=2013&DocNum=5862&SeqNum=0> (last visited Dec. 8, 2015).

25. During debate on Senate Bill 325, proposed amendments from Wake County Representatives Yvonne Holley (to add a referendum), Darren Jackson (to add two at-large districts to the existing nine numbered districts), and Rosa Gill (to make the lettered districts at large) were voted down in the House. Senate Bill 325 / S.L. 2013-110, North Carolina General Assembly,

<http://www.ncleg.net/gascripts/BillLookUp/BillLookUp.pl?Session=2013&BillID=s325> (last visited Dec. 8, 2015).

26. On June 13, 2013, Senate Bill 325 was ratified and chaptered as Session Law 2013-110. *Id.*

27. Population deviations in the numbered and lettered districts under Senate Bill 325 as enacted were as follows:

District	Deviation	Percentage deviation
1	-523	-0.41%
2	-1,350	-1.05%
3	4,678	3.63%
4	1,591	1.24%
5	-1,971	-1.53%
6	2,061	1.60%
7	-4,484	-3.48%
A	22,088	4.90%
B	-22,089	-4.90%

Stat Pack, S.B. 325. Ex. 253.

28. Individual House members' votes on Senate Bill 325 on second reading, broken down by political party registration, were as follows:

<b>Representative</b>	<b>Vote</b>	<b>Party Registration</b>
Arp	Aye	Republican
Avila	Aye	Republican
J. Bell	Aye	Republican
Blackwell	Aye	Republican
Blust	Aye	Republican
Boles	Aye	Republican
R. Brawley	Aye	Republican
W. Brawley	Aye	Republican
Brody	Aye	Republican
R. Brown	Aye	Republican
Bryan	Aye	Republican
Bumgardner	Aye	Republican
Burr	Aye	Republican
Catlin	Aye	Republican
Cleveland	Aye	Republican
Collins	Aye	Republican
Conrad	Aye	Republican
Daughtry	Aye	Republican
Davis	Aye	Republican
Dixon	Aye	Republican
Dobson	Aye	Republican
Dockham	Aye	Republican
Dollar	Aye	Republican
Elmore	Aye	Republican
Ford	Aye	Republican
Fulghum	Aye	Republican
Hardister	Aye	Republican
Hastings	Aye	Republican
Hollo	Aye	Republican
Holloway	Aye	Republican
Howard	Aye	Republican
Hurley	Aye	Republican
Iler	Aye	Republican
Jeter	Aye	Republican
Jones	Aye	Republican
Jordan	Aye	Republican
Lambeth	Aye	Republican
Langdon	Aye	Republican
Lewis	Aye	Republican
S. Martin	Aye	Republican



McElraft	Aye	Republican
McGrady	Aye	Republican
McNeill	Aye	Republican
Millis	Aye	Republican
Moffitt	Aye	Republican
T. Moore	Aye	Republican
Murry	Aye	Republican
Pittman	Aye	Republican
Presnell	Aye	Republican
Ramsey	Aye	Republican
Riddell	Aye	Republican
S. Ross	Aye	Republican
Saine	Aye	Republican
Samuelson	Aye	Republican
Schaffer	Aye	Republican
Setzer	Aye	Republican
Shepard	Aye	Republican
Stam	Aye	Republican
Starnes	Aye	Republican
Steinburg	Aye	Republican
Stevens	Aye	Republican
Stone	Aye	Republican
Szoka	Aye	Republican
Torbett	Aye	Republican
Turner	Aye	Republican
H. Warren	Aye	Republican
Wells	Aye	Republican
West	Aye	Republican
Whitmire	Aye	Republican
Adams	No	Democrat
Alexander	No	Democrat
Baskerville	No	Democrat
L. Bell	No	Democrat
Brandon	No	Democrat
Brisson	No	Democrat
Carney	No	Democrat
Cunningham	No	Democrat
Earle	No	Democrat
Faircloth	No	Republican
Farmer-Butterfield	No	Democrat
Fisher	No	Democrat
Floyd	No	Democrat
Foushee	No	Democrat
Gill	No	Democrat
Glazier	No	Democrat

Goodman	No	Democrat
C. Graham	No	Democrat
G. Graham	No	Democrat
D. Hall	No	Democrat
L. Hall	No	Democrat
Hamilton	No	Democrat
Hanes	No	Democrat
Harrison	No	Democrat
Holley	No	Democrat
Horn	No	Republican
Insko	No	Democrat
Jackson	No	Democrat
Johnson	No	Republican
Lucas	No	Democrat
Luebke	No	Democrat
G. Martin	No	Democrat
McManus	No	Democrat
Michaux	No	Democrat
Mobley	No	Democrat
R. Moore	No	Democrat
Pierce	No	Democrat
Queen	No	Democrat
Richardson	No	Democrat
Speciale	No	Republican
Terry	No	Democrat
Tine	No	Democrat
Tolson	No	Democrat
Wray	No	Democrat
Hager	Abstain	Republican
Tillis	Abstain	Republican
B. Brown	Absent	Republican
Cotham	Absent	Democrat
Malone	Absent	Republican
Waddell	Absent	Republican
Wilkins	Absent	Republican

Roll Call on House Second Reading of Senate Bill 325, North Carolina General Assembly, <http://www.ncleg.net/gascripts/voteHistory/RollCallVoteTranscript.pl?sSession=2013&sChamber=H&RCS=906> (last visited Dec. 11, 2015); NC Voter Lookup, North Carolina State Board of Elections, [http://www.ncsbe.gov/webapps/voter\\_search/](http://www.ncsbe.gov/webapps/voter_search/) (last visited Dec. 11, 2015).

29. No African-American legislator voted for S.B. 325. Answer to *Wright* Complaint, ECF No. 30 (11/04/13).

Wake Board of County Commissioners election data

30. Members of the Wake Board of County Commissioners elected from 2000 through 2014, and their political party registrations, are as follows:

Year	Name	Political party registration
2000	Kenn Gardner	Republican
2000	Vernon Malone	Democrat
2000	Betty Lou Ward	Democrat
2002	Joe Bryan	Republican
2002	Herb Council	Republican
2002	Tony Gurley	Republican
2002	Phil Jeffries	Republican
2004	Kenn Gardner	Republican
2004	Betty Lou Ward	Democrat
2004	Harold Webb	Democrat
2006	Lindy Brown	Democrat
2006	Joe Bryan	Republican
2006	Paul Coble	Republican
2006	Tony Gurley	Republican
2008	Stan Norwalk	Democrat
2008	Betty Lou Ward	Democrat
2008	Harold Webb	Democrat
2010	Joe Bryan	Republican
2010	Paul Coble	Republican
2010	Tony Gurley	Republican
2010	Phil Matthews	Republican
2012	Caroline Sullivan	Democrat
2012	Betty Lou Ward	Democrat
2012	James West	Democrat
2014	John Burns	Democrat
2014	Matt Calabria	Democrat
2014	Sig Hutchinson	Democrat
2014	Jessica Holmes	Democrat

Past Election Results, Wake County Board of Elections,

<http://www.wakegov.com/elections/data/Pages/pastelectionresults.aspx> (last visited Dec. 8,

2015) (see General Elections on Nov. 7, 2000; Nov. 5, 2002; Nov. 2, 2004; Nov. 7, 2006; Nov. 4, 2008; Nov. 2, 2010; Nov. 6, 2012; and Nov. 4, 2014); NC Voter Lookup, North Carolina State Board of Elections, [https://enr.ncsbe.gov/voter\\_search\\_public/](https://enr.ncsbe.gov/voter_search_public/) (last visited Dec. 11, 2015).

31. From 2000 through November 2014, African-American candidates were elected to the Wake Board of County Commissioners by the following margins:

<b>Year</b>	<b>Candidate</b>	<b>Margin of Victory</b>
2000	Vernon Malone	3.66%
2004	Harold Webb	5.24%
2006	Lindy Brown	6.3%
2008	Harold Webb	17.32%
2012	James West (unopposed)	100.0%
2014	Jessica Holmes	12.7%

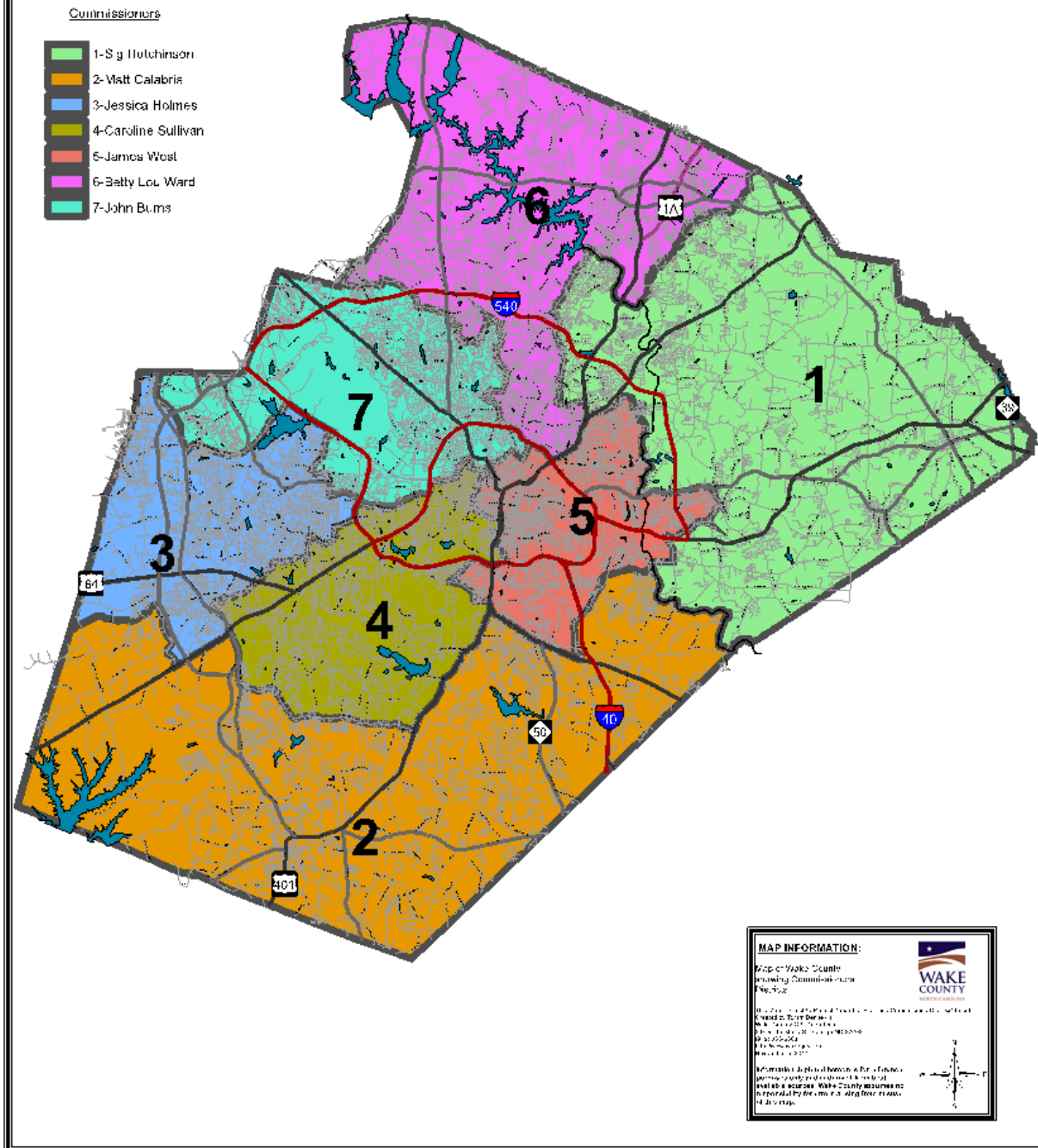
Past Election Results, Wake County Board of Elections,

<http://www.wakegov.com/elections/data/Pages/pastelectionresults.aspx> (last visited Dec. 8, 2015) (see General Elections on Nov. 7, 2000; Nov. 2, 2004; Nov. 7, 2006; Nov. 4, 2008; Nov. 6, 2012; and Nov. 4, 2014).

32. Before 2015, members of the Wake Board of County Commissioners were elected at large, in a countywide vote, from seven residency districts. Commission Facts, Wake County Board of Commissioners, <http://www.wakegov.com/commissioners/Pages/facts.aspx> (last visited Dec. 8, 2015).

33. After the 2010 Census, the Wake Board of County Commissioners adjusted the boundaries of its seven residency districts as follows:

# WAKE COUNTY COMMISSIONERS' DISTRICTS



Wake County Commissioners' Districts, Wake County GIS,



[http://www.wakegov.com/gis/services/Documents/CommissionerDist\\_8x11.pdf](http://www.wakegov.com/gis/services/Documents/CommissionerDist_8x11.pdf) (last visited Dec. 8, 2015).

Senate Bill 181

34. Senate Bill 181 was filed in the North Carolina General Assembly on March 4, 2015 by Senator Chad Barefoot of Wake and Franklin counties. Senate Bill 181 / S.L. 2015-4, North Carolina General Assembly,

<http://www.ncleg.net/gascripts/BillLookUp/BillLookUp.pl?Session=2015&BillID=s181> (last visited Dec. 8, 2015).

35. Senate Bill 181 redistricts the Wake Board of County Commissioners using seven numbered single-member districts and two lettered single-member “super districts” that overlap the seven numbered districts. Senate Bill 181 / S.L. 2015-4, North Carolina General Assembly, <http://www.ncleg.net/Sessions/2015/Bills/Senate/PDF/S181v6.pdf> (last visited Dec. 8, 2015).

36. Senate Bill 181 adopted the same numbered and lettered districts that were previously enacted by Senate Bill 325. *Id.*

37. On March 5, 2015, the Senate Redistricting Committee held a non-voting meeting to hear public comment on Senate Bill 181. Senate Bill 181 / S.L. 2015-4, North Carolina General Assembly,

<http://www.ncleg.net/gascripts/BillLookUp/BillLookUp.pl?Session=2015&BillID=s181> (last visited Dec. 8, 2015).

38. On March 10, 2015, the Senate Redistricting Committee heard public comment on Senate Bill 181 and voted to favorably report the bill to the full Senate for consideration. *Id.*

39. On March 11 and 12, 2015, the Senate debated and passed Senate Bill 181. *Id.*

40. During debate on Senate Bill 181, a proposed amendment from Senator Josh Stein of Wake County was tabled in the Senate. *Id.*

41. Individual senators' votes on Senate Bill 181 on second reading, broken down by political party registration, were as follows:

Senator	Vote	Party registration
Alexander	Aye	Republican
Apodaca	Aye	Republican
Barefoot	Aye	Republican
Barringer	Aye	Republican
Berger	Aye	Republican
Bingham	Aye	Republican
Brock	Aye	Republican
Brown	Aye	Republican
Cook	Aye	Republican
Daniel	Aye	Republican
Gunn	Aye	Republican
Harrington	Aye	Republican
Hartsell	Aye	Republican
Hise	Aye	Republican
B. Jackson	Aye	Republican
Krawiec	Aye	Republican
Lee	Aye	Republican
McInnis	Aye	Republican
Meredith	Aye	Republican
Newton	Aye	Republican
Pate	Aye	Republican
Rabin	Aye	Republican
Randleman	Aye	Republican
Rucho	Aye	Republican
Sanderson	Aye	Republican
Soucek	Aye	Republican
Tarte	Aye	Republican
Tillman	Aye	Republican
Tucker	Aye	Republican
Wade	Aye	Republican
Wells	Aye	Republican
Blue	No	Democrat
Bryant	No	Democrat
Clark	No	Democrat
D. Davis	No	Democrat
Ford	No	Democrat

Foushee	No	Democrat
J. Jackson	No	Democrat
Lowe	No	Democrat
McKissick	No	Democrat
Robinson	No	Democrat
Smith	No	Democrat
Smith-Ingram	No	Democrat
Stein	No	Democrat
Van Duyn	No	Democrat
Waddell	No	Democrat
Woodard	No	Democrat
Curtis	Absent	Republican
J. Davis	Absent	Republican
Rabon	Absent	Republican

Roll Call for Senate Second Reading of Senate Bill 181, North Carolina General Assembly, <http://www.ncleg.net/gascripts/voteHistory/RollCallVoteTranscript.pl?sSession=2015&sChamber=S&RCS=33> (last visited Dec. 11, 2015); NC Voter Lookup, North Carolina State Board of Elections, [http://www.ncsbe.gov/webapps/voter\\_search/](http://www.ncsbe.gov/webapps/voter_search/) (last visited Dec. 11, 2015).

42. On March 31, 2015, the House Elections Committee heard public comment on Senate Bill 181 and voted to favorably report the bill to the full House for consideration. <http://www.ncleg.net/gascripts/BillLookup/BillLookup.pl?Session=2015&BillID=s181>.

43. On April 1, 2015, the House debated and passed Senate Bill 181. *Id.*

44. During legislative debate on Senate Bill 181, proposed amendments from Wake County Representatives Rosa Gill (to substitute an alternative district map), Darren Jackson (to eliminate the two lettered districts or make them truly at large, and to move elections to even-numbered years), and Grier Martin (to add a referendum) were voted down in the House. *Id.*; House Elections Committee Meeting Notes, Joint Ex. 12.

45. Individual House members' votes on Senate Bill 181 on second reading, broken down by political party registration, were as follows:

<b>Representative</b>	<b>Vote</b>	<b>Party Registration</b>
Arp	Aye	Republican
Avila	Aye	Republican
J. Bell	Aye	Republican
Bishop	Aye	Republican
Blackwell	Aye	Republican
Blust	Aye	Republican
Boles	Aye	Republican
Bradford	Aye	Republican
Brawley	Aye	Republican
Brisson	Aye	Democrat
Brody	Aye	Republican
B. Brown	Aye	Republican
R. Brown	Aye	Republican
Bryan	Aye	Republican
Bumgardner	Aye	Republican
Burr	Aye	Republican
Catlin	Aye	Republican
Cleveland	Aye	Republican
Collins	Aye	Republican
Conrad	Aye	Republican
Daughtry	Aye	Republican
Dixon	Aye	Republican
Dollar	Aye	Republican
Elmore	Aye	Republican
Faircloth	Aye	Republican
Ford	Aye	Republican
C. Graham	Aye	Democrat
Hager	Aye	Republican
Hardister	Aye	Republican
Hastings	Aye	Republican
Holloway	Aye	Republican
Horn	Aye	Republican
Hurley	Aye	Republican
Jones	Aye	Republican
Jordan	Aye	Republican
Lambeth	Aye	Republican
Langdon	Aye	Republican
Lewis	Aye	Republican
Malone	Aye	Republican
S. Martin	Aye	Republican
McElraft	Aye	Republican
McGrady	Aye	Republican
McNeill	Aye	Republican
Millis	Aye	Republican

T. Moore	Aye	Republican
Pendleton	Aye	Republican
Pittman	Aye	Republican
Presnell	Aye	Republican
Riddell	Aye	Republican
Robinson	Aye	Republican
Ross	Aye	Republican
Saine	Aye	Republican
Schaffer	Aye	Republican
Shepard	Aye	Republican
Speciale	Aye	Republican
Stam	Aye	Republican
Steinburg	Aye	Republican
Stevens	Aye	Republican
Szoka	Aye	Republican
Torbett	Aye	Republican
R. Turner	Aye	Republican
Warren	Aye	Republican
Watford	Aye	Republican
West	Aye	Republican
Whitmire	Aye	Republican
Yarborough	Aye	Republican
Adcock	No	Democrat
Ager	No	Democrat
Alexander	No	Democrat
Baskerville	No	Democrat
L. Bell	No	Democrat
Brockman	No	Democrat
Carney	No	Democrat
Cotham	No	Democrat
Cunningham	No	Democrat
Earle	No	Democrat
Farmer-Butterfield	No	Democrat
Fisher	No	Democrat
Floyd	No	Democrat
Fraley	No	Republican
G. Graham	No	Democrat
Gill	No	Democrat
Glazier	No	Democrat
Goodman	No	Democrat
D. Hall	No	Democrat
L. Hall	No	Democrat
Hamilton	No	Democrat
Hanes	No	Democrat
Harrison	No	Democrat



Holley	No	Democrat
Howard	No	Republican
Hunter	No	Democrat
Insko	No	Democrat
Jackson	No	Democrat
Jeter	No	Republican
L. Johnson	No	Republican
R. Johnson	No	Democrat
Lucas	No	Democrat
G. Martin	No	Democrat
Meyer	No	Democrat
Michaux	No	Democrat
R. Moore	No	Democrat
Pierce	No	Democrat
Queen	No	Democrat
Reives	No	Democrat
B. Richardson	No	Democrat
Salmon	No	Democrat
Setzer	No	Republican
Terry	No	Democrat
Tine	No	Unaffiliated
B. Turner	No	Democrat
Willingham	No	Democrat
Wray	No	Democrat
Adams	Absent	Republican
Davis	Absent	Republican
Dobson	Absent	Republican
Iler	Absent	Republican
Luebke	Absent	Democrat
Waddell	Absent	Democrat
Zachary	Absent	Republican

# Roll Call for House Second Reading of Senate Bill 181, North Carolina General

Assembly,

<http://www.ncleg.net/gascripts/voteHistory/RollCallVoteTranscript.pl?sSession=2015&sChamber=H&RCS=164> (last visited Dec. 11, 2015); NC Voter Lookup, North Carolina State Board of Elections, [http://www.ncsbe.gov/webapps/voter\\_search/](http://www.ncsbe.gov/webapps/voter_search/) (last visited Dec. 11, 2015).

46. No African-American legislator voted for S.B. 181. Answer to RWCA Amended Complaint, ECF No. 22 (6/5/15).

47. On April 2, 2015, Senate Bill 181 was ratified and chaptered as Session Law 2015-4.

<http://www.ncleg.net/gascripts/BillLookup/BillLookup.pl?Session=2015&BillID=s181>.

Additional publicly available election information

48. Plaintiffs Dustin Matthew Ingalls and Perry Woods, who are white, and Plaintiff Jannet B. Barnes, who is black, live in numbered District 4 under Senate Bill 181. NC Voter Lookup, North Carolina State Board of Elections, [https://enr.ncsbe.gov/voter\\_search\\_public/](https://enr.ncsbe.gov/voter_search_public/) (last visited Dec. 11, 2015).

49. Wake County precinct numbers and corresponding polling places are as follows:

Precinct Number	Polling Place
01-01	BROOKS AVENUE CHURCH OF CHRIST
01-02	UNITARIAN UNIVERSALIST FELLOWSHIP OF RALEIGH
01-03	ST JOHNS BAPTIST CHURCH
01-04	DANIELS MIDDLE SCHOOL
01-05	WHITE MEMORIAL PRESBYTERIAN CHURCH
01-06	CAMERON VILLAGE REGIONAL LIBRARY
01-07	WILEY ELEMENTARY SCHOOL
01-07A	SAINT SAVIOUR'S CENTER
01-09	OUR SAVIOR LUTHERAN CHURCH
01-10	WESTMINSTER PRESBYTERIAN CHURCH
01-11	ROOT ELEMENTARY SCHOOL
01-12	EMMANUEL BAPTIST CHURCH
01-13	ST MATTHEW AME CHURCH
01-14	TRINITY UNITED METHODIST CHURCH
01-15	DOUGLAS ELEMENTARY SCHOOL
01-16	GLEN EDEN PILOT PARK COMM CNTR
01-17	NORTH HILLS CLUB
01-18	EASTGATE PARK COMM CNTR
01-19	POE INTERNATIONAL MONTESSORI SCHOOL
01-20	ROBERTS PARK COMMUNITY CENTER
01-21	RALEIGH FIRE STATION #2
01-22	SOUTHEAST RALEIGH MAGNET HIGH SCHOOL
01-23	PULLEN COMMUNITY CENTER

01-25	WASHINGTON GT MAGNET ELEMENTARY SCHOOL
01-26	CHAVIS COMMUNITY CENTER
01-27	PROJECT ENLIGHTENMENT
01-28	POWELL ELEMENTARY SCHOOL
01-29	LACY ELEMENTARY SCHOOL
01-30	BROOKS MUSEUMS MAGNET ELEMENTARY SCHOOL
01-31	METHOD COMMUNITY CENTER
01-32	POWELL DRIVE COMMUNITY CENTER
01-33	MARTIN GT MAGNET MIDDLE SCHOOL
01-34	TARBORO ROAD COMMUNITY CENTER
01-35	FULLER GT MAGNET ELEMENTARY SCHOOL
01-36	KIWANIS PARK COMMUNITY CENTER
01-37	HUDSON MEMORIAL PRESBYTERIAN CHURCH
01-38	RALEIGH FIRE STATION #11
01-39	OPTIMIST PARK COMMUNITY CENTER
01-40	WORTHDALE COMMUNITY CENTER
01-41	COMBS LEADERSHIP MAGNET ELEMENTARY SCHOOL
01-42	MILLBROOK EXCHANGE PARK COMMUNITY CENTER
01-43	ST RAPHAEL CATHOLIC CHURCH
01-44	MILLBROOK ELEMENTARY MAGNET SCHOOL
01-45	CHRIST BAPTIST CHURCH
01-46	GREEN ROAD PARK COMMUNITY CENTER
01-47	MOUNT VERNON BAPTIST CHURCH
01-48	WESTERN BOULEVARD PRESBYTERIAN CHURCH
01-49	ALL STS ANTIOCHIAN ORTHODOX CHRISTIAN CHURCH
01-50	MACEDONIA NEW LIFE CHURCH
01-51	NORTH BEND CLUBHOUSE
02-01	BAILEYWICK ROAD ELEMENTARY SCHOOL
02-02	PLEASANT UNION ELEMENTARY SCHOOL
02-03	BLUE JAY POINT COUNTY PARK
02-04	BRASSFIELD ELEMENTARY SCHOOL
02-05	BAYLEAF VOLUNTEER FIRE DEPT #2
02-06	NORTH RALEIGH CHURCH OF CHRIST
03-00	GREATER CHRISTIAN CHAPEL CHURCH
04-01	GLENAIRE
04-02	CARY FIRE STATION #2
04-03	TRIANGLE AQUATIC CENTER
04-04	KIRK OF KILDAIRE PRESBYTERIAN CHURCH
04-05	REEDY CREEK ELEMENTARY SCHOOL
04-06	FARMINGTON WOODS ELEM SCHOOL
04-07	FELLOWSHIP OF CHRIST PRESBYTERIAN CHURCH
04-08	CARY FIRST CHRISTIAN CHURCH
04-09	WEATHERSTONE ELEMENTARY SCHOOL
04-10	PEACE PRESBYTERIAN CHURCH
04-11	HERBERT C YOUNG COMMUNITY CENTER

04-12	CROSSROADS FORD SERVICE CENTER
04-13	WESTHIGH EVANGELICAL COVENANT CHURCH
04-14	CARY FIRE STATION #4
04-15	GOOD SHEPHERD UNITED CHURCH OF CHRIST
04-16	FIRST REFORMED CHURCH OF CARY
04-17	CARY FIRE STATION #1
04-18	CARY ACADEMY
04-19	COVENANT CHRISTIAN CHURCH
04-20	SHA'AREI SHALOM SYNAGOGUE
04-21	HARVEST CHURCH CARY
05-01	MORRISVILLE ELEMENTARY SCHOOL
05-03	CARY CHURCH OF GOD
05-05	BRIER CREEK COMMUNITY CENTER
05-06	CARPENTER ELEMENTARY SCHOOL
05-07	BRECKENRIDGE CLUBHOUSE
05-08	HINDU SOCIETY OF NORTH CAROLINA
06-04	HUNT COMMUNITY CENTER
06-05	HOLLY RIDGE MIDDLE SCHOOL
06-06	HOLLY SPRINGS ELEMENTARY SCHOOL
06-07	TRIANGLE COMMUNITY CHURCH
06-08	HOLLY SPRINGS CULTURAL CENTER
06-09	WAKE COUNTY FIREARMS EDUCATION AND TRAINING CENTER
06-10	HOLLY GROVE ELEMENTARY SCHOOL
07-01	RALEIGH FIRE STATION #17
07-02	JEFFREYS GROVE ELEMENTARY SCHOOL
07-03	SHELLEY LAKE SERTOMA PARK
07-04	LYNN ROAD ELEMENTARY SCHOOL
07-05	RAVENSCROFT SCHOOL
07-06	LEAD MINE ELEMENTARY SCHOOL
07-07	GOOD SHEPHERD LUTHERAN CHURCH
07-07A	SPRINGMOOR RETIREMENT COMMUNITY
07-09	BENSON MEMORIAL UNITED METHODIST CHURCH
07-10	PILGRIM PRESBYTERIAN CHURCH
07-11	GREYSTONE BAPTIST CHURCH
07-12	YORK ELEMENTARY SCHOOL
07-13	NORTH RALEIGH CHURCH OF THE NAZARENE
08-02	LEESVILLE ROAD ELEMENTARY SCHOOL
08-03	COVENANT CHURCH INTERNATIONAL
08-04	SOAPSTONE UNITED METHODIST CHURCH
08-05	NORTH RALEIGH PRESBYTERIAN CHURCH
08-06	CALVARY PRESBYTERIAN CHURCH
08-07	WOOD VALLEY SWIM AND RACQUET CLUB
08-08	DURHAM HIGHWAY FIRE STATION #1
08-09	HILBURN DRIVE ACADEMY

08-10	RALEIGH FIRE STATION #23
08-11	LONG LAKE CLUBHOUSE
09-01	HOPKINS RURAL FIRE DEPT
09-02	ZEBULON ROTARY-WOMANS CLUB
09-03	WAKE COUNTY EASTERN REGIONAL CENTER
10-01	EAST WAKE HIGH SCHOOL
10-02	WENDELL MIDDLE SCHOOL
10-03	CARVER ELEMENTARY SCHOOL
10-04	CENTRAL BAPTIST CHURCH
11-01	LINCOLNVILLE AME CHURCH
11-02	STOUGH ELEMENTARY SCHOOL
12-01	BALLENTINE ELEMENTARY SCHOOL
12-02	FUQUAY VARINA COMMUNITY CENTER
12-04	WILLOW SPRINGS ELEMENTARY SCHOOL
12-05	WEST LAKE MIDDLE SCHOOL
12-06	WAKE COUNTY SOUTHERN REGIONAL CENTER
12-07	BANKS ROAD ELEMENTARY
12-08	ST AUGUSTA MISSIONARY BAPTIST CHURCH
12-09	FUQUAY VARINA HIGH SCHOOL
13-01	SAINT MATTHEW BAPTIST CHURCH
13-02	DURANT ROAD MIDDLE SCHOOL
13-05	RALEIGH VINEYARD CHRISTIAN FELLOWSHIP
13-06	DURANT ROAD ELEMENTARY SCHOOL
13-07	BODY OF CHRIST CHURCH
13-08	FOX ROAD ELEMENTARY SCHOOL
13-09	WILDWOOD FOREST ELEMENTARY SCHOOL
13-10	BEDFORD AT FALLS RIVER CLUBHOUSE
13-11	THE GREENWAY CLUB AT FALLS RIVER
14-01	OLIVE GROVE BAPTIST CHURCH
14-02	WAKE COUNTY STONY HILL FIRE- EMS STATION
15-01	TURNER MEMORIAL BAPTIST CHURCH
15-02	HOLLANDS UNITED METHODIST CHURCH
15-03	PLYMOUTH CHURCH
15-04	RAND ROAD ELEMENTARY SCHOOL
16-01	SPRINGFIELD BAPTIST CHURCH
16-02	CREECH ROAD ELEMENTARY SCHOOL
16-03	GARNER ADVENT CHRISTIAN CHURCH
16-04	AVERSBORO ELEMENTARY SCHOOL
16-05	SMITH ELEMENTARY SCHOOL
16-06	VANDORA SPRINGS ELEMENTARY SCHOOL
16-07	HEATHER HILLS CLUBHOUSE
16-08	BARWELL ROAD COMMUNITY CENTER
16-09	BINGHAM STATION CLUBHOUSE
17-01	BEACON BAPTIST CHURCH
17-02	KNIGHTDALE ELEMENTARY SCHOOL

17-03	WILLOW OAK CLUBHOUSE
17-04	KNIGHTDALE UNITED METHODIST CHURCH
17-05	TRINITY PRESBYTERIAN CHURCH
17-06	EASTERN WAKE FIRE-RESCUE DEPT
17-07	WAKE COUNTY COMMONS BUILDING
17-08	HODGE ROAD ELEMENTARY SCHOOL
17-09	ABUNDANT LIFE CHRISTIAN CENTER
17-10	RALEIGH INTERNATIONAL CHURCH
17-11	ST JAMES UNITED METHODIST CHURCH
18-01	TEMPLE OF PENTECOST
18-02	FAIRVIEW BAPTIST CHURCH
18-03	PINEY PLAIN CHRISTIAN CHURCH
18-04	YATES MILL ELEMENTARY
18-05	OAK GROVE ELEMENTARY SCHOOL
18-06	DILLARD DRIVE ELEMENTARY SCHOOL
18-07	MID-WAY BAPTIST CHURCH
18-08	SOUTH HILLS BAPTIST CHURCH
19-03	WAKE FOREST CHURCH OF GOD
19-04	RICHLAND CREEK COMMUNITY CHURCH
19-05	WAKE FOREST PRESBYTERIAN CHURCH
19-07	J B FLAHERTY PARK COMMUNITY CTR
19-09	ROLESVILLE ELEMENTARY SCHOOL
19-10	JONES DAIRY ELEMENTARY SCHOOL
19-11	WAKE FOREST COMMUNITY HOUSE
19-12	HERITAGE MIDDLE SCHOOL
19-13	WAKEFIELD MIDDLE SCHOOL
19-14	NORTH FOREST PINES ELEMENTARY SCHOOL
19-15	WAKEFIELD NORTH - 9TH GRADE CENTER
19-16	HARRIS CREEK ELEMENTARY SCHOOL
19-17	RALEIGH FIRE STATION # 28
20-01	LUFKIN ROAD MIDDLE SCHOOL
20-03	EVA H PERRY REGIONAL LIBRARY
20-04	DAVIS DRIVE MIDDLE SCHOOL
20-05	RESURRECTION LUTHERAN CHURCH
20-06A	NEW HORIZON FELLOWSHIP-ANNEX
20-06B	ST MARY MAGDALENE CATHOLIC CHURCH
20-08	APEX BAPTIST CHURCH
20-09	ST ANDREW THE APOSTLE CATHOLIC CHURCH
20-10	CARY FIRE STATION #5
20-11	OLIVE CHAPEL BAPTIST CHURCH
20-12	OLIVE CHAPEL ELEMENTARY SCHOOL
20-14	WHITE OAK MISSIONARY BAPTIST CHURCH
20-15	ALSTON RIDGE ELEMENTARY SCHOOL
20-16	MILLS PARK ELEMENTARY SCHOOL
20-17	HIGHCROFT DRIVE ELEMENTARY SCHOOL



Spreadsheet of All Polling Places, Wake County Board of Elections,

<http://msweb03.co.wake.nc.us/bordelec/downloads/13pollingplaces/PollingPlaceDetails.xls> (last visited Dec. 11, 2015).

*Authenticity of exhibits and publicly available documents*

50. The parties stipulate that documents publicly available from government entities in either hard or electronic copy are authentic and admissible for evidentiary purposes even if such documents are not presented by the custodian.

*Miscellaneous*

51. The parties stipulate that the document attached to these stipulations as Exhibit A accurately reflect data updated and publicly produced on December 12, 2014, by the North Carolina Association of County Commissions (NCACC), which reports the method of election used by each of North Carolina's 100 counties to elect its board of county commissioners. That data is available on NCACC's website at:

<http://www.ncacc.org/195/County-Election-Methods>

Respectfully submitted this 15th day of December, 2015.

/s/ Allison J. Riggs

Anita S. Earls

Allison J. Riggs

George E. Eppsteiner

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*Counsel for Defendant Wake County Board  
of Elections*

### **CERTIFICATE OF SERVICE**

This is to certify that the undersigned has on this day filed using ECF the foregoing **First Joint Stipulations** in the above-titled action to the Clerk of the Court.

This the 15th day of December, 2015.

/s/ Allison J. Riggs  
Allison J. Riggs

*Counsel for Plaintiffs*